

REMARKS

Applicant respectfully requests further examination and reconsideration in view of the comments set forth fully below. Claims 2-6, 10-17, 20-25, 27-36, 38-45, 47 and 48 were pending. Within the Office Action dated August 17, 2009, Claims 2-6, 10-17, 20-25, 27-36, 38-45, 47 and 48 have been rejected. By the above amendments, Claims 2, 22, 35, 44 and 48 have been amended. Accordingly, Claims 2-6, 10-17, 20-25, 27-36, 38-45, 47 and 48 are now pending.

Within the Office Action, prior art reference “Tock” is cited by name only. Applicant, in this response, assumes the Examiner is referring to U.S. Patent No. 7,085,817 to Tock et al., which is cited by the Examiner in the included Notice of References Cited.

Amendments to the Claims

Within the Advisory Action, it is stated that prosecution might move forward with better clarification of what it means “to wrap a link.” Accordingly, Applicant has amended each of the independent Claims 2, 22, 35, 44 and 48 to clarify the meaning of “to wrap a link” by including the limitation **“wherein said wrapped version provides remote access to respective content within the network that is otherwise unattainable by the client device outside the network.”** Support for these claim amendments is found throughout the present specification, such as on page 7, line 10 to page 8, line 2. No new matter are introduced by these claim amendments.

Rejections Under 35 U.S.C. § 103

Within the Office Action, Claims 2-6, 10-17, 20, 22-25, 27-33, 35, 36, 38-42, 44, 45, 47 and 48 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,163,779 to Mantha et al. (hereinafter “Mantha”) in view of U.S. Application No. 2002/0116444 to Chaudhri et al. (hereinafter “Chaudhri”) and U.S. Patent No. 6,804,783 to Wesinger, Jr. et al. (“Wesinger”) and U.S. Patent No. 7,085,817 to Tock et al. (hereinafter “Tock”). Applicant respectfully traverses these rejections.

Within the Advisory Action dated November 10, 2009, it is stated that Applicant cannot attack the rejection piecemeal. Applicant respectfully submit that Applicant was simply showing that the cited references together do not teach all the components of the claim, as suggested by the Examiner. As required by MPEP 2143.03, all claim limitations must be taught or suggested by the prior art.

Each of the independent Claims 2, 22, 35, 44 and 48 recites, in one form or another, claim limitation “wrapping, by the server, said link to obtain a wrapped version of said link that identifies a resolvable address on the network in the event it is determined in said step (d) that said link is resolvable by the domain name system internal to said network, and not wrapping said link in the event it is determined in said step (d) that said link is resolvable by the external Internet domain name system” (herein referred to “**determining to wrap based on resolvability**”), claim limitation “**wherein said wrapped version provides remote access to respective content within the network that is otherwise unattainable by the client device outside the network,**” and claim limitation “**delivering said first electronic content unmodified to said client device if said link is not wrapped in step (e), wherein said original version is said first electronic content that is unmodified,**” wherein each is discussed below.

Mantha teaches a method of copying a web page presented for display on a browser of a web client. The method includes first copying the base HTML document to the client local storage and establishing a pointer to the copied document. A first linked list of the hypertext references in the base document is then generated. For each hypertext reference in the first linked list, if the hypertext reference refers to an embedded object in the base HTML document, the embedded object is saved on the client local storage and the file name of the saved embedded object is stored (as a fully-qualified URL) in a second linked list. If the hypertext reference does not refer to an embedded object in the base HTML document, the fully-qualified URL of the hypertext reference is stored in the second linked list. Then, the fully-qualified URLs of the second linked list (including those associated with the stored images) are updated to point to the files located on the client local storage. In the end, there is a new HTML page with links for images pointing to files on the local hard drive. When the user desires to retrieve the copied page, a link to the pointer is activated. [Mantha, Abstract] Mantha does not teach “**wherein said wrapped version provides remote access to respective content within the network that is otherwise unattainable by the client device outside the network.**” Further, it is recognized on page 4 of the Office Action that Mantha does not teach “**determining to wrap based on resolvability**” or “**delivering an original, unmodified version of the content.**”

Chaudhri teaches a method and system for providing improved acceleration of network content using an intermediate node and/or dynamic translations. [Chaudhri, Abstract] More specifically, Chaudhri teaches retargetters which speed up network content delivery. Retargetters provide real-time rerouting of HTML pages to connect content from a publisher’s servers to the

most desirable content distribution network (CDN) as determined either wholly or in part by each individual viewer. [Chaudhri, ¶ 0049] Chaudhri does not teach that **“wherein said wrapped version provides remote access to respective content within the network that is otherwise unattainable by the client device outside the network.”** Further, it is recognized on page 4 of the Office Action that Chaudhri does not teach **“determining to wrap based on resolvability”** or **“delivering an original, unmodified version of the content.”**

Wesinger teaches a firewall that provides enhance network security by employing “envoys.” No traffic can pass through the firewall unless the firewall has established an envoy for that traffic. [Wesinger, Abstract] The firewall is associated with a respective domain name server. [Wesinger, col. 8, lines 9-10] DNS is a distributed database system that translates host names to IP addresses and IP addresses to host names. [Wesinger, col. 7, lines 46-49] The primary function of a firewall is to selectively allow and disallow communication. [Wesinger, col. 9 lines 9-10] Wesinger does not teach a mechanism for retrieving electronic content that is associated with a local network. Since Wesinger does not teach wrapping links within the electronic content by the server, Wesinger does not teach **“determining to wrap based on resolvability”** or **“wherein said wrapped version provides remote access to respective content within the network that is otherwise unattainable by the client device outside the network.”** Further, it is recognized on page 4 of the Office Action that Wesinger does not **“delivering an original, unmodified version of the content.”**

Within the Advisory Action, it is stated that Wesinger is cited for teaching “resolvability” by the firewall. However, Applicant respectfully submit that it is well settled that to establish a *prima facie* case of obviousness, three basic criteria must be met:

- 1) there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings;
- 2) there must be a reasonable expectation of success; and
- 3) the prior art reference, or references, must teach or suggest all the claim limitations. MPEP § 2143.

The burden of establishing a *prima facie* case of obviousness based on the teachings of Mantha, Chaudhri and Wesinger has not been met within the Office Action. Further, it would not be obvious to one skilled in the art to incorporate the *firewall and its resolvability ability* of Wesinger into the content retrieval of Mantha and content distribution of Chaudhri since content

retrieval/distribution of Mantha and Chaudhri would be changed by the combination. There is no teaching in any of the references to hint, teach or suggest this combination.

According to MPEP § 2143.01, if the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious. In re Ratti, 270 F.2d 810 (CCPA 1959). Within In re Ratti, the claims were directed to an oil seal comprising a bore engaging portion with outwardly biased resilient spring fingers inserted in a resilient sealing member. The primary reference relied upon in a rejection required rigidity for operation whereas the claimed invention required resiliency. The rejection was reversed by the court holding the “suggested combination of references would require a substantial reconstruction and redesign of the elements shown in [the primary reference] as well as a change in the basic principle under which [the primary reference] construction was designed to operate.” The present situation is similar.

Wesigner teaches a firewall used to control the flow of data between two networks. Wesigner teaches that the primary function of the firewall is to selectively allow and disallow communication. Mantha teaches retrieving local copies of web pages from the local hard drive. Chaudhri teaches improved acceleration of content distribution by redirecting users to a preferred CDN. Combining the firewall of Wesigner with the content retrieval and content distribution of Mantha and Chaudhri, respectively, substantially changes the operation of content retrieval and distribution of Mantha and Chaudhri, respectively. Particularly, since Mantha teaches local retrieval of documents, no firewalls are necessary to control the flow of data between two networks. Further, the firewall of Wesigner would prohibit the accelerated distribution of content of Chaudhri because the firewall is another layer in which processing must take place. To implement the firewall of Wesigner with local content retrieval of Mantha and content distribution of Chaudhri would require substantial modifications and redesign of the system of both Mantha and Chaudhri. Such substantial modifications would not avoid added costs, as suggested by the Examiner. For at least these reasons, the combination of Mantha, Chaudhri and Wesigner is not proper.

In order to establish a valid case of obviousness, the invention must be viewed in the state of the art that existed at the time of the invention. Applicants respectfully submit that it is only the improper use of hindsight which may possibly render the improvements made by the present invention appear obvious.

Even if considered proper, the combination of Mantha, Chaudhri and Wesigner do not teach **“wherein said wrapped version provides remote access to respective content within the network that is otherwise unattainable by the client device,” “determining to wrap based on resolvability,” or “delivering an original, unmodified version of the content.”**

Within the Advisory Action, it is stated that Tock is cited “on the grounds that it teaches determining resolvability and sows that it can be determined whether a link should be wrapped or modified.” However, within the Office Action, Tock is apparently cited for teaching “delivering an original, unmodified version of the content.” Specifically, the Examiner cites col. 7, line 27 - col. 9, line 50 of Tock as teaching this limitation. However, Applicant respectfully disagrees. Tock teaches that responses are modified so that internal links point to the intermediary server instead of one or more remote servers. After the response has been modified, the modified response is saved to the central storage to enable subsequent retrieval of previously viewed resources. Tock also teaches that unmodified response are saved to the central storage. [Tock, col. 7, lines 29-38] Tock does not teach **“delivering an original, unmodified version of the content.”** Instead, unmodified version of the content in Tock is a copy retrieved from the central storage. Further Tock does not teach **“determining to wrap based on resolvability” or “wherein said wrapped version provides remote access to respective content within the network that is otherwise unattainable by the client device.”** Instead, all hyperlinks within Tock are altered to point to the intermediary server to provide users with enhanced environment for accessing remote resources.

Accordingly, neither Mantha, Chaudhri, Wesigner, Tock or in combination teaches **“wherein said wrapped version provides remote access to respective content within the network that is otherwise unattainable by the client device,” “determining to wrap based on resolvability,” or “delivering an original, unmodified version of the content.”** Since each of the independent Claims 2, 22, 35, 44 and 48 recite at least these limitations not taught by Mantha, Chaudhri, Wesigner, Tock and their combination, independent Claims 2, 22, 35, 44 and 48 are each an allowable base claims.

Claims 3-6, 10-17 and 20 are dependent upon independent Claim 2. Claims 23-25 and 27-33 are dependent upon independent Claim 22. Claims 36 and 38-42 are dependent upon independent Claim 35. Claims 45 and 47 are dependent upon independent Claim 44. As discussed above, independent Claim 2, 22, 35 and 44 is allowable over the teachings of Mantha,

Chaudhri, Wesigner and their combination. Accordingly, Claims 3-6, 10-17, 20, 23-25, 27-33, 36, 38-42, 45 and 47 are also allowable as being dependent upon an allowable base claim.

Furthermore, Mantha, Chaudhri, Wesigner, Tock and their combination do not teach dependent Claims 5, 24 and 36. Each includes the limitation **“said link includes an external address portion identifying said network device and an internal address portion identifying a second electronic content within said network.”** Within the Office Action, Mantha, Figure 15 is again cited as teaching this limitation. The Examiner repeats the rejection by asserting that “www.artscape.com” is the external address portion and that “/ceramics.html” is the internal address portion without explaining why Applicant is incorrect. MPEP 707.07 states that the Examiner should take note of the Applicant’s argument and answer the substance of it. Applicant respectfully submit that the Examiner’s assertion is improper, because the cited URL in Mantha is merely a standard URL with “www.artscape.com” as the host name and “/ceramics.html” as the path or specific resource within the host to be accessed. In contrast, the present invention includes an external address portion (208) that corresponds to an address that is resolvable outside the local network including a numerical IP address that was assigned by the local DNS and thus is not resolvable outside the local network. The link also contains an address portion (212) that includes an unqualified symbolic name that is an internal name within the local network and thus not resolvable outside the local network. [Present Specification, page 11, lines 6-15] For at least these additional reasons, Claims 5, 24 and 36 are allowable over the teachings of Mantha, Chaudhri, Wesigner, Tock and their combination.

Within the previous Office Action, Claims 21, 34 and 43 were rejected under 35 U.S.C. §103(a) as being unpatentable over Mantha, Chaudhri, Wesigner, Tock and further in view of U.S. Patent No. 6,581,065 to Rodkin et al. (hereinafter “Rodkin”). Applicant respectfully disagrees.

Claim 21 is dependent on independent Claim 2. Claim 34 is dependent on independent Claim 22. Claim 43 is dependent on independent Claim 35. As described above, independent Claims 2, 22 and 35 are all allowable over the teachings of Mantha, Chaudhri, Wesigner, Tock and their combination. Accordingly, Claims 21, 34 and 43 are also allowable as being dependent upon an allowable base claim.

For these reasons, Applicant respectfully submits that all of the claims are now in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, the Examiner is encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,
HAVERSTOCK & OWENS LLP

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By: /Thomas B. Haverstock/
Thomas B. Haverstock
Reg. No. 32,571
Attorneys for Applicant(s)